

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF NEW YORK

CHARLOTTE FREEMAN, et al.,

Plaintiffs,

v.

HSBC HOLDINGS PLC, et al.,

Defendants.

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Case No. 14-cv-6601 (DLI)(CLP)

Oral Argument Requested

Served: March 16, 2015

**DEFENDANT BANK SADERAT PLC'S  
NOTICE OF MOTION TO DISMISS THE COMPLAINT**

**PLEASE TAKE NOTICE** that, upon the accompanying Memorandum of Law of Defendant Bank Saderat PLC ("BSPLC") in Support of Its Motion to Dismiss the Complaint, as well as all papers submitted and to be submitted of pleadings, motions and proceedings herein, including those of BSPLC's co-defendants to dismiss the complaint (to the extent applicable and in which BSPLC joins), BSPLC by and through its undersigned attorneys will move before the Honorable Dora L. Irizarry, U.S.D.J., U.S. Courthouse, 225 Cadman Plaza East, Brooklyn, New York 11201, at a date and time to be designated by the Court, for an Order pursuant to Federal Rules of Civil Procedure 12(b)(1), 12(b)(2) and 12(b)(6), as may be shown, granting BSPLC's motion to dismiss the complaint against BSPLC, and for such other and further relief as the Court may deem just and proper.

**PLEASE TAKE FURTHER NOTICE** that counsel for BSPLC hereby requests  
oral argument.

Dated: March 16, 2015

Respectfully submitted,

/s/Jeremy D. Frey

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